

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA
Plaintiff

vs.

STARSKY D. BOMER

CASE NO. 4:16cr257-2

EXHIBIT LIST OF DEFENDANT STARSKY BOMER

NO.	DESCRIPTION	OFR	OBJ	ADM	N/ADM
1	E-Mail dated 7/19/11 from Bomer attaching financial reports (0001-0050)			10/1	
2	E-mail dated 8/12/11 from Dale regarding financial oversight fees (0051)		✓	10/1	
3	E-mail dated 8/15/11 from Sullivan to partners that Dr. Siddiqui has followed the rules (0052)			10/1	
4	E-mail dated 8/16/11 from Siddiqui that our PHPs are clean (0053-0055)			10/1	
5	E-mail dated 8/17/11 from Siddiqui regarding Liberty PHP (0056-0073)			10/1	
	0074-0075 - Intentionally Deleted				
6	E-mail dated 8/29/11 from Siddiqui regarding TriMed PHP being in full conformity with law (0076-0077)			10/1	
7	E-mail dated 9/1/11 from Dale regarding financial oversight fees (0078)		✓	10/1	
8	E-mail dated 9/19/11 from Siddiqui attaching Transportation Services Agreement (0079-0087)			10/1	
9	E-mail string dated 9/21/11 between Sullivan and Siddiqui regarding Transportation Policy (0088-0102)			10/1	
10	E-mail dated 9/26/11 from Sullivan responding to Siddiqui transportation questions (0103-0104)			10/1	

11	E-mail string dated November 7, 2011 from Siddiqui to Bomer regrading financial questions and referencing PHPs (0105-0106)			10 / 1	
12	E-mail string dated November 16, 2011 from Bomer regarding Hospital disputes (0107-0110)			10 / 1	
13	E-mail string from Siddiqui dated February 8, 2012 regarding transportation policy (0111-0112)			10 / 1	
14	E-mail string from Poston dated February 9, 2012 regarding transportation policy (0113-0114)			10 / 1	
15	E-mail from Poston to Siddiqui dated February 10, 2012 regarding corporate compliance program for PHPs (0115)			10 / 1	
16	E-mail from Siddiqui dated February 20, 2012 regarding partnership disputes and rearding compliance program (0116-0118)			10 / 1	
17	E-mail from Bomer dated March 15, 2012 attaching transportation contracts (0119-0159)		✓	10 / 1	
18	E-mail string from Dr. Qayyum dated March 21, 2012 regarding several issues effecting quality of care at PHPs (0160-0163)			10 / 1	
19	E-mail from Siddiqui dated April 2, 2012 regarding "a bunch of mental retards" (0164)			10 / 1	
20	E-mail from Siddiqui dated April 2,2012 regarding compliance program going forward (0165)			10 / 1	
21	E-mail from Siddiqui to Bomer dated April 18, 2012 that "you can start another PHP with non-qualifiers" (0166-0176)			10 / 1	
22	E-mail from Siddiqui to Bomer dated April 26, 2012 to "Report Abby incident ASAP" (0177)			10 / 1	
	0178-0179 - Intentionally Deleted				
23	E-mail string from Siddiqui to Poston dated April 29, 2012 regarding transportation limits (0180)			10 / 1	
	0181 - Intentionally Deleted				
24	Draft OIG letter (0182-0210)			10 / 1	

25	E-mail from Siddiqui to Poston dated May 12, 2012 that the statement by Dr. Zaidi that "wrongful operation of the PHP based on compliance issue" is "slander" (0211-0213)			10/1	
26	E-mail from Siddiqui to Virginia dated May 14, 2012 regarding OIG compliance letter (0214)			10/1	
27	E-mail string from Dr. Qayyum dated May 26, 2012 attaching an initial psychiatric evaluation form (0215-0220)			10/1	
28	E-mail string from Dr. Qayyum dated May 21, 2012 attaching an intake screening form (0221-0222)			10/1	
29	E-mail string from Renee Austin dated May 21, 2012 regarding Poverty Guidelines (0223-0224)			10/1	
	0225 - Intentionally Deleted				
30	E-mail string from Bomer dated June 2, 2012 regarding false allegations of Danny Cox (0226-0232)			10/1	
31	E-mail string from Poston to Dr. Bavarre and Siddiqui dated June 1, 2012 regarding partnership disputes and regarding compliance program (0233-0234)			10/1	
32	E-mail string from Siddiqui to law firm dated July 3, 2012 regarding letter to OIG (0235-0237)			10/1	
33	E-mail string from Siddiqui to law firm dated July 5, 2012 to review draft of OIG letter with attachments (0238-0240)			10/1	
34	E-mail string from Tina Travis dated July 27, 2012 regarding Rules for Therapists (0241-0243)			10/1	
35	E-mail from Munaiza Siddiqui to Bomer dated October 24, 2012 regarding check to Kamal for transportation (0244-0253)			10/1	
36	E-mail from Munaiza Siddiqui to Bomer dated October 31, 2012 regarding check to Kamal for transportation (0254-0255)			10/1	
37	Text messages between Bomer and Mitch Spencer dated February 27, 2012 that Bomer has no say in who qualifies (0256)		✓	10/1	—

38	Text messages between Bomer and Mitch Spencer dated May 24, 2012 that "it's the psychiatrist call who makes it and who doesn't" (0257)		✓		10%
39	Text messages between Siddiqui and Poston dated March 10, 2012 inquiring whether he is done with the transport and meals policy for Atrium (0258)		✓		✓
40	Text messages between Bomer and DeeDee dated March 14, 2012 and March 19, 2012 that Bomer cannot pay DeeDee cash and can only pay DeeDee if she transports patients (0259-0260)		✓		✓
41	Text messages between Poston and Bomer dated April 19, 2012 through April 29, 2012 regarding self-reporting Abby, OIG packet and transportation (0261-0262)		✓		✓
42	Text messages between Siddiqui and Bomer dated April 26, 2012 through May 8, 2012 regarding transportation contracts, OIG opinion, and "we aren't playing Geraldine's games" (0263-0265)		✓		✓
43	Text messages between Geraldine and Bomer dated May 22, 2012 through June 12, 2012 regarding billable patients and scholars (0266-0267)		✓		✓
44	Text messages between Bomer and DeeDee dated June 25, 2012 to January 23, 2013 stating I won't pay above Medicare rate (0268-0271)		✓		✓
45	Text messages between Siddiqui and Bomer dated August 3, 2012 through October 3, 2012 regarding Excel spreadsheet for transportation as we discussed (0272-0273)		✓		✓
46	Text messages between Geraldine and Bomer dated March 21, 2013 through March 31, 2013 that "we have not and will never do anything wrong" (0274)		✓		✓
47	Text messages between Bomer and Jay Cooper dated October 18, 2013 through January 23, 2014 that we can't pay for patients, there has to be a service (0275-0276)		✓		✓

48	Text messages between Bomer and Kimberly Safe Haven dated November 18, 2013 that I can't pay you for people you don't transport (0277)		✓		10/1
49	Bomer phone contact of Shawna with FBI (0278)			10/1	
50	Text messages between Bomer and Poston dated April 28, 2012 that Siddiqui is working on a packet for an OIG opinion; and inquiring on the Medicare rate for transportation (0279)		✓		10/1
51	E-mail from Siddiqui dated August 29, 2011 that our PHPs are in full conformity with Stark law and Federal Anti-Kickback Statute (0280-0281)			10/1	
52	E-mail from attorney Sullivan to Siddiqui dated June 28, 2011 regarding changes to compliance plan (0282-0290)			10/1	
53	E-mail string from Bomer dated July 20, 2012 regarding various outpatient services (0291-0304)			10/1	
54	E-mail from Danny Cox dated July 14, 2011 regarding Corporate Compliance Plan (0305)			10/1	
55	E-mails to Bomer dated August 12, 2011, September 28, 2011 and September 7, 2011 regarding financial oversight fees for outpatient services (0306-0309)		✓	10/1	
56	E-mails from Bomer, Poston and Siddiqui that Danny Cox is a liar (0310-0311)			10/1	
57	E-mail from Siddiqui dated May 8, 2011 to Bomer setting forth PHP rules and that Siddiqui will personally oversee compliance and billing (0312)			10/1	
58	E-mail from Brandi Perry dated December 12, 2011 listing discharged patients (0313)			10/1	
59	E-mail string between Siddiqui and Karl Killian regarding specialist in PHP coding and billing (0314-0315)			10/1	
60	E-mail from Poston to Siddiqui regarding partnership disputes and regarding a PHP audit to make sure we are in full compliance with Medicare (0316)			10/1	

61	E-mail from Siddiqui dated October 24, 2013 responding to various partnership disputes including PHP allegations (0317-0327)			10/1	
62	E-mail from Siddiqui dated May 12, 2012 responding to allegations from Dr. Zaidi that the PHP is being improperly operated (0328-0330)			10/1	
63	E-mail from Poston dated May 8, 2012 regarding census (0331-0332)			10/1	
64	E-mail from Siddiqui to Mr. Wilridge dated February 19, 2012 regarding partners' feud; other side of story is we are happy to do audit (0333)			10/1	
65	E-mail string from Dt. Qayyum regarding input to therapists questions (0334-0335)			10/1	
66	Video of undercover meeting with Bomer on June 7, 2012			10/1	
67	Video of meeting with Bomer and patients on April 30, 2012 referencing Derek Belton			10/1	
68	Tape recording of meeting between Bomer and Kimberly Safe Haven			10/1	
69	Tape recording of meeting between Dr. Jacobs and therapists			10/1	
70	Tape recording made by Siddiqui of telephone conference with Bomer shortly after both were interviewed by OIG <i>June 2016</i>		✓	10/1	
71	Analysis of Bomer bank deposits			10/1	
72	<i>Transcript of conference 25 pp 30</i>		✓	10/1	<i>not for jury</i>
73					
74	<i>Employment papers for Bomer</i>		✓	10/4	
75	<i>Patient discharge. admit from 6X136-</i>		✓	10/4	

CERTIFICATE OF SERVICE

It is hereby certified that service of the foregoing Exhibit List has been made by U.S. Mail or electronic means on September 26, 2018 to all counsel of record.

/s/ Richard Kuniansky
 Richard Kuniansky

EXHIBIT LIST OF

ADV. NO.